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*Counsel for Plaintiffs and the Proposed Classes*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

JILL LEOVY, NICHOLAS GUILAK,  
 CAROLINA BARCOS, PAUL MARTIN,  
 MARILYN COUSART, ALESSANDRO DE LA  
 TORRE, VLADISLAV VASSILEV, JANE  
 DASCALOS, and minor G.R., individually, and  
 on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

**STIPULATION AND [PROPOSED]  
 ORDER TO SET BRIEFING  
 SCHEDULE FOR DEFENDANT'S  
 ANTICIPATED MOTION TO  
 DISMISS FIRST AMENDED  
 COMPLAINT**

Judge: Hon. Araceli Martínez-Olgún

1 Defendant Google LLC and Plaintiffs Leovy, Nicholas Guilak, Carolina Barcos, Paul  
2 Martin, Marilyn Cousart, Alessandro De La Torre, Vladisslav Vassilev, Jane Dascalos, and minor  
3 G.R. (collectively, “the Parties”), by and through their respective counsel of record, hereby  
4 stipulate as follows:

5 WHEREAS, Plaintiffs filed this action on July 11, 2023 (ECF No. 1);

6 WHEREAS, Defendant filed its motion to dismiss on October 16, 2023 (ECF No. 20);

7 WHEREAS, Plaintiffs filed a notice of intent to file a First Amended Complaint in lieu of  
8 opposition to Defendant’s motion to dismiss on October 30, 2023 (ECF No. 25);

9 WHEREAS, the Court granted the Parties’ stipulated request for Plaintiffs to file a First  
10 Amended Complaint by January 5, 2024 (ECF No. 27),

11 WHEREAS, Plaintiffs filed a First Amended Complaint on January 5, 2024 (ECF No. 28),  
12 which adds new allegations, claims, and plaintiffs;

13 WHEREAS, Defendant anticipates responding to the First Amended Complaint by filing  
14 a motion to dismiss;

15 WHEREAS, the Parties have conferred on a briefing schedule for Defendant’s anticipated  
16 motion to dismiss, and have agreed upon the below schedule, for which they agree there is good  
17 cause;

18 WHEREAS, the Parties have not previously sought any extension of the time for Defendant  
19 to respond to the First Amended Complaint;

20 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties agree, subject  
21 to the approval of the Court, as follows:

- 22 1. Defendant’s response to Plaintiffs’ First Amended Complaint shall be due on or before  
23 February 9, 2024;
  - 24 2. Plaintiffs’ opposition to any motion to dismiss shall be due on or before March 15,  
25 2024;
  - 26 3. Defendant’s reply shall be due on or before April 5, 2024.
- 27  
28

Respectfully submitted,

Dated: January 16, 2024

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ David H. Kramer

David H. Kramer  
dkramer@wsgr.com

*Counsel for Defendant*

Dated: January 16, 2024

CLARKSON LAW FIRM  
Professional Corporation

By: /s/ Yana Hart

Yana Hart  
yhart@clarksonlawfirm.com

*Counsel for Plaintiffs and the Proposed Classes*

**SIGNATURE ATTESTATION**

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer

David H. Kramer

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2024

\_\_\_\_\_  
HON. ARACELI MARTÍNEZ-OLGUÍN  
UNITED STATES DISTRICT COURT JUDGE